

Mallinckrodt Inc.



June 22, 2009

Materials Licensing Section
U.S. Nuclear Regulatory Commission
2443 Warrenville Road, Ste. 210
Lisle, IL 60532-4352
Attention: Mr. Kevin Null

Subject: License No. 24-04206-01, Docket No. 030-00001
Reference: Letter from J. Schuh to K. Null dated March 31, 2009 re License
Number 24-04206-01

Dear Mr. Null:

As a follow-up to your telephone conversations with Dan Hoffman earlier today, we are submitting a revised amendment request related to the subject license.

This amendment request includes an updated Section 5 and Section 6 (see Attachment 1) which includes accelerator produced radionuclides which are produced, possessed and/or used at the Maryland Heights facility. This amendment request also includes a request to change the Radiation Safety Officer from James R. Schuh to Daniel E. Hoffman. Qualifications and experience for Mr. Hoffman and a Delegation of Authority signed by me are provided in Attachment 2 of this letter.

This request for amendment supersedes the amendment request for License No. 24-04206-01 that was submitted on March 31, 2009, which included revisions to Sections 7 through 11 in addition to updated Sections 5 and 6.

Also per your recent discussions with Dan Hoffman, this letter is intended to confirm our intention to resubmit the application for new license to cover manufacturing of radioisotopes using accelerators in accordance with NUREG-1556, Vol. 21 without any references to the application and amendment requests for the Broad Scope License.

If you have any questions regarding this letter or the enclosures, please contact me, Jim Schuh at 314-654-7981 or Dan Hoffman at 314-654-7906.

Sincerely,

A handwritten signature in black ink that reads "Mitzi Pennington". The signature is fluid and cursive, with the first name "Mitzi" being particularly prominent.

Mitzi Pennington
Site Director

Attachments: NRC Form 313 and Attachments 1 and 2

cc: Jim Schuh – Mallinckrodt
Dan Hoffman – Mallinckrodt

2703 WAGNER PLACE
MARYLAND HEIGHTS, MO
63043

RECEIVED JUN 23 2009

APPLICATION FOR MATERIALS LICENSE

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects.resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

OFFICE OF FEDERAL & STATE MATERIALS AND ENVIRONMENTAL MANAGEMENT PROGRAMS
DIVISION OF MATERIALS SAFETY AND STATE AGREEMENTS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
612 E. LAMAR BOULEVARD, SUITE 400
ARLINGTON, TX 76011-4125

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

A. NEW LICENSE

B. AMENDMENT TO LICENSE NUMBER 24-04206-01

C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)

Mallinckrodt, Inc.
2703 Wagner Place
Maryland Heights, MO 63043

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

Mallinckrodt, Inc.
2703 Wagner Place
Maryland Heights, MO 63043

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Daniel E. Hoffman

TELEPHONE NUMBER

(314) 654-7906

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL
a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.

9. FACILITIES AND EQUIPMENT.

11. WASTE MANAGEMENT.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

10. RADIATION SAFETY PROGRAM.

12. LICENSE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY	3A	AMOUNT ENCLOSED	\$ 0.00
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13. CERTIFICATION (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE: **Mitzi Pennington, Site Director**

SIGNATURE: *Mitzi Pennington*

DATE: *22 Jun 09*

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	

Attachment 1

Amended License Application, Sections 5 and 6

Section 5

Table 5-1

Radioactive Materials to be Possessed

Radionuclide	Chemical/ Physical Form	Maximum Possession Limit	Proposed Use
a. Any byproduct material with Atomic Numbers 1 through 83 (except as specified below):	Any	Not to exceed 100 curies per radionuclide, total possession limit 300 curies (except as specified below):	Production and possession of a radiochemical for research and development of radiopharmaceuticals. For use in manufacturing, processing and packaging of radiopharmaceuticals and/or radiochemicals. For possession and storage incident to production activities.
b. Mo-99	Any	13,000 curies	Production and possession of a radiochemical for research and development of radiopharmaceuticals. For use in manufacturing, processing and packaging of radiopharmaceuticals and/or radiochemicals. For possession and storage incident to production activities.
c. Tc-99m	Any	10,000 curies	Production and possession of a radiochemical for research and development of radiopharmaceuticals. For use in

Section 5

Radionuclide	Chemical/ Physical Form	Maximum Possession Limit	Proposed Use
			manufacturing, processing and packaging of radiopharmaceuticals and/or radiochemicals. For possession and storage incident to production activities.
d. I-131	Any	500 curies	Production and possession of a radiochemical for research and development of radiopharmaceuticals. For use in manufacturing, processing and packaging of radiopharmaceuticals and/or radiochemicals. For possession and storage incident to production activities.
e. Xe-133	Any	800 curies	Production and possession of a radiochemical for research and development of radiopharmaceuticals. For use in manufacturing, processing and packaging of radiopharmaceuticals and/or radiochemicals. For possession and storage incident to production activities.
f. Ga-67	Any	300 curies	Production and possession of a

Section 5

Radionuclide	Chemical/ Physical Form	Maximum Possession Limit	Proposed Use
			radiochemical for research and development of radiopharmaceuticals. For use in manufacturing, processing and packaging of radiopharmaceuticals and/or radiochemicals. For possession and storage incident to production.
g. In-111	Any	30 curies	Production and possession of a radiochemical for research and development of radiopharmaceuticals. For use in manufacturing, processing and packaging of radiopharmaceuticals and/or radiochemicals. For possession and storage incident to production activities.
h. Pb-201	Any	1050 curies	Production and possession of a radiochemical for research and development of radiopharmaceuticals. For use in manufacturing, processing and packaging of radiopharmaceuticals and/or radiochemicals. For possession and

Section 5

Radionuclide	Chemical/ Physical Form	Maximum Possession Limit	Proposed Use
			storage incident to production activities.
i. Tl-201	Any	350 curies	Production and possession of a radiochemical for research and development of radiopharmaceuticals. For use in manufacturing, processing and packaging of radiopharmaceuticals and/or radiochemicals. For possession and storage incident to production activities.
j. I-123	Any	10 curies	Production and possession of a radiochemical for research and development of radiopharmaceuticals. For use in manufacturing, processing and packaging of radiopharmaceuticals and/or radiochemicals. For possession and storage incident to production activities.
k. Cu-64	Any	3500 curies per nuclide	Possession and storage incident to production activities.
l. Ga-66	Any	800 curies per nuclide	Possession and storage incident to production activities.

Section 5

Radionuclide	Chemical/ Physical Form	Maximum Possession Limit	Proposed Use
m. In-110	Any	200 curies per nuclide	Possession and storage incident to production activities.
n. Depleted Uranium	Metal (Shielding)	67,000 kilograms	For use as shielding in transportation containers, possession and storage.
o. Depleted Uranium	Metal (in slab form for calibrations)	1 millicurie	Calibration and check of instruments.
p. Cs-137	Sealed Sources	Not to exceed 100 curies total	Calibration and check of instruments.
q. Am-241, Po-210	Sealed Sources	Not to exceed 5 microcuries per nuclide	Calibration and check of instruments.
r. Sr-90	Sealed Sources	Not to exceed 5 millicuries	Calibration and check of instruments.
s. H-3, C-14, Cl-36, Co-60, Tc-99, I-129, Ba-133, Eu-152	Sealed Sources	Not to exceed 1 millicurie per nuclide	Calibration and check of instruments.

Note: This amended license application includes information regarding accelerator produced radionuclides that are currently produced, possessed or stored at the Maryland Heights site. No other radioactive materials or increases in authorized amounts are being requested as part of this license amendment application.

Section 6

Purpose for which Licensed Materials will be Used

The requested materials will be utilized for manufacturing, processing, packaging, and distribution of radiopharmaceuticals and radiochemicals. The requested materials will also be utilized for research and development of new radiopharmaceuticals and radiochemicals. In addition, some of the radionuclides listed above are produced in particle accelerators; some that are processed into final products and others that are produced incidentally from production of the isotopes of interest. Also, some materials will just be used for possession and storage incident to production activities.

In addition, some radioactive material associated with Mallinckrodt Inc. products will be accepted back from our customers for disposal via our decay-in-storage program and for reclamation of the packaging materials. Additional details associated with this return program are provided in Section 11 of this application for amendment. Also, in accordance with our letter dated December 8, 2005, the Maryland Heights plant may accept small amounts of low-level radioactive material from the Mallinckrodt pharmacies, for purposes of consolidation, packaging and offsite transport for disposal.

Finally, some of the authorized material will be utilized to support the radiation protection program. Typical uses in this category would be for instrument calibrations and instrument response checks.

Because the requested possession limits are in excess of the quantities specified in 10 CFR 30.72, we have established an emergency response plan in accordance with 10 CFR 30.32 (i)(3). This plan was previously transmitted to the NRC. We reserve the right to make changes to the plan without prior Commission approval if our Radiation Safety Committee (RSC) determines the changes do not decrease the effectiveness of the plan. If our RSC determines the proposed changes may decrease the effectiveness of the plan, those changes will be submitted to the Commission for approval prior to implementation.

Attachment 2

Daniel E. Hoffman, CHP, CSP, CHMM

Business Address:
Mallinckrodt, Inc.
2703 Wagner Place
Maryland Heights, MO 63043
(314) 654-7906

Summary of Qualifications

Dan Hoffman has over 30 years of experience in implementation of environmental and health and safety programs and 25 years of supervisory and program management experience. Experienced in managing EH&S and Radiation Protection programs at manufacturing/industrial facilities as well as environmental remediation and decommissioning projects involving a wide variety of and radioactive materials and other hazardous materials.

Professional Experience

Mallinckrodt – Maryland Heights, MO Nuclear Medicine Production Facility

Sep 2007 – Present

Radiation Safety Officer

Assist in the management of the Radiation Protection Program at a 400-employee nuclear medicine manufacturing site. Assist in the oversight of all radiological safety aspects of plant operations and radioactive material transportation activities under NRC Broad Scope and Medical Distribution licenses. Ensure compliance with applicable NRC and State of Missouri regulations. Operations include processing of various reactor produced medical isotopes and nuclides produced in the onsite cyclotron units.

Consultant to K2 Environmental Services, LLC

Mar 2007 – Aug 2007

Provided Health Physics support and served as interim Project Health Physicist at Middlesex Sampling Plant FUSRAP site in Middlesex, NJ. Site was undergoing remediation for removal of contaminated soils. Primary contaminants were Ra-226, Uranium, PAHs and lead. Authored 2006 Environmental Surveillance Report which included review and analysis of environmental and occupational radiological exposure monitoring data. Authored Final Status Survey Reports and provided technical assistance in support of radiological surveying activities.

Consultant to Safe Day Consulting

Feb 2006 – Aug 2007

Conducted risk assessments, safety program development, industrial hygiene monitoring and EH&S training at pharmaceutical research laboratory facilities, foundries, printing operations and various other industrial sites. Risk assessments include a review of existing operations and practices, including evaluation of industrial safety, biological, chemical and radiological hazards; personal protective equipment, engineering controls and environmental/waste management practices. Work also included development of lockout/tag-out programs, industrial hygiene air monitoring, noise surveys, EMF hazard evaluations, EH&S audits and occupational safety and health training.

K2 Environmental Services, LLC

Aug 2005 – Jan 2006

Westinghouse FFCF Decommissioning Project, Hematite, MO

Attachment 2

EH&S Manager

Environmental, Health and Safety Manager for decommissioning of the former nuclear fuel fabrication facility. Responsibilities include management and oversight of the environmental, safety and health programs for the decommissioning of the site, which includes removal of contaminated tanks, piping and equipment from the former process buildings. Conduct daily safety briefings and EH&S oversight inspections to ensure conformance to plans, procedures, and regulatory requirements. Also provided independent review/verification of ISOCS radioanalytical measurements of containers and process equipment to quantify residual radioactive materials.

K2 Environmental Services, LLC

Mar 2005 – August 2005

FHWMF Remediation Project

Brookhaven National Laboratory

Upton, NY

Corporate Health Physicist/Health and Safety Mgr

Served as senior K2 project representative for radiological remediation of the Former Hazardous Waste Management Facility (FHWMF) site at Brookhaven National Laboratory (BNL). Responsibilities included management of health physics, waste management/transportation, radiological characterization and final status surveys using the Multi-Agency Radiation Survey and Site Investigation (MARSSIM) Manual guidance. The project involved remediation, packaging and transportation of contaminated soils, sediments and structures at the FHWMF site. The project scope also included packaging and shipment of radiological wastes from the Building 811 remediation project at BNL. Development and oversight of final status surveys and radiological dose assessments using the RESRAD code to verify that site cleanup goals and radiological dose objectives were attained. Primary radionuclides included Cs-137 and Sr-90.

Pangea Group, St. Louis, MO

Nov 1999 – Mar 2005

Vice President and Manager of EH&S Services

Developed and implemented comprehensive EH&S, Radiation Protection and Quality Assurance (QA) Programs and implementing standard operating procedures (SOPs). Applied for and obtained an NRC Materials License for decommissioning and waste management activities at other licensed facilities. Developed Site Safety and Health Programs for various environmental remediation, waste management and construction projects including the Weldon Spring Ordnance Works Closure Project (St. Charles, MO); the Gulf Nuclear Removal Action and Demolition project (Odessa, TX); and the Transportation, Removal and Disposal of Wastes from former USAF Radium Gauge Burial Site (Waco, TX). Responsibilities included acquisition of a mobile Decommissioning License from NRC Region III. Duties included conduct of internal EH&S and QA audits of company operations. Also served as a consultant for various private clients engaged in various radioactive material and waste management operations. Audits for private clients included audits of environmental remediation and decommissioning projects; nuclear medicine production facilities and radioactive material transportation operations.

Jacobs Engineering Group, Inc - Weldon Spring Remedial Action Project, St. Charles, MO

Sept 1987 – Nov 1999

Attachment 2

- **Senior Jacobs Engineering Site Representative/ES&H Manager** – Responsibilities at WSSRAP included management of all environmental, radiation protection, and industrial hygiene programs as well as the occupational medical program, emergency management and response functions, and environmental data verification and validation. Jacobs' staffing levels at the site during this period ranged from 60 to 90 full time technical and professional staff. The success of the occupational safety and health program at the project led to the award of the prestigious Star Status award under the Department of Energy's Voluntary Protection Program. Responsible for development and implementation of industry-leading programs in the area of worker and environmental protection programs and the site's Integrated Safety Management System (ISMS).
- **Deputy Environmental, Safety and Health (ES&H) Manager**- Responsible as the senior technical manager with full time responsibility for ES&H functions and implementation of ISMS at the project site. Total professional and technical staff under the Deputy ES&H Manager averaged about 60 full time personnel. During peak periods of remediation at the site, the total project manpower was in excess of 600 personnel, including subcontractor craft, technical, administrative, and supervisory/management staff. The ES&H Department was responsible for oversight of all field operations across the site. Multiple large-scale remediation operations were being performed concurrently during this period, including demolition of numerous process buildings; excavation and treatment of contaminated wastes and soils; wastewater treatment operations; disposal cell construction; and waste placement activities. Radiation protection, health physics and environmental protection programs were subject to frequent audits on applicable regulatory requirements including the CAA, CWA, RCRA, CERCLA, OSHA and DOE programs.
- **Worker Protection Manager**- Responsible for health physics, industrial hygiene, the on-site radiological laboratory, occupational medical, fire protection and emergency response functions at the project site. Was responsible for compliance with OSHA and DOE regulatory programs for the above functional areas. Managed and coordinated development of programs for personnel, protection, monitoring and training. Responsible for all field oversight functions as well as administrative and program development under the site's Quality Assurance Program.
- **Site Industrial Hygienist**- Responsible for the development, coordination, and administration of exposure monitoring medical and surveillance activities as well as Safety and Health training and development of Safety and Health procedures. Provided technical and managerial support in the areas of process and utility piping systems dismantlement, asbestos abatement, building dismantlement, radiological decontamination activities and containerized chemical consolidation projects.

National Steel Corporation, Granite City, IL

Feb 1977 – Sept 1987

Held various technical and managerial positions at National Steel including Manager of Environmental Health, Manager of Environmental Control, Environmental Specialist, Environmental Analyst, and Environmental Technician. Duties included monitoring and evaluating performance of air and water pollution and control systems. Management responsibilities included solid waste disposal facilities and development of solid and hazardous waste handling procedures. Served as Radiation Safety Officer for sealed sources under agreement state license. Responsibilities also included coordination and resolution of environmental matters with Federal, State and local regulatory agencies, acquisition of required permits, and recordkeeping and reporting.

Attachment 2

Sigma Chemical Company, St. Louis, MO - Production Technician
June 1976 – Feb 1977

Regulatory Experience

Has working knowledge of US NRC and US Department of Energy regulations, guidelines and directives as well as OSHA and EPA regulatory programs. Experienced in coordinating with various state and Federal regulatory agencies.

Education

University of Missouri-St. Louis, BA/Biology, 1976 (Cum Laude)

Registration/Certifications/Training (partial listing)

Certified Health Physicist, 2000, #4660

Certified Industrial Hygienist, 1987, #3762 (certification lapsed in 2005)

Certified Safety Professional, 1995 #3466, Recertified 2006

Certified Hazardous Materials Manager – Master Level, 1990, #2387

MARSSIM Training – ORISE (Jan 2000)

29 CFR 1910.120 (40 hr & 8 hr Supervisor)

Professional Organization Activity

President, St. Louis Section of the American Industrial Hygiene Assoc. (2006-2007)

Treasurer, Health Physics Society, Decommissioning Section (2004)

Current member of the Health Physics Society

Attachment 2

Mr. Hoffman's experience working with, and supervising the use of radioactive materials is detailed in the table below.


Isotope of Use	Amount	Location of Experience	Duration	Type
Natural Uranium and Thorium series radionuclides	Multi-Curie	Weldon Spring Site Remedial Action Project, St. Charles, MO	12 years	Radiological Site Remediation
Am-241, Cs-137	Millicuries	Gulf Nuclear Site, Odessa, TX	8 months	Radiological Site Remediation
Cs-137, Sr-90	Multi-Curie	Brookhaven National Laboratory, Upton, NY	6 months	Radiological Site Remediation
Low-enriched U-235	Multi-Curie	Westinghouse Hematite Site, Festus, MO	6 months	Radiological Site Remediation
Atomic #'s 3-83, Depleted Uranium	Multi-Curie	Mallinckrodt, Maryland Heights, MO	1½ years	HP Support of Manufacturing

Attachment 2

Delegation of Authority for Radiation Safety Officer

Daniel Hoffman has been appointed Radiation Safety Officer for License No. 24-04206-01 and is responsible for ensuring the safe use of radioactive material under the license. The Radiation Safety Officer is responsible for managing the radiation safety program; identifying radiation safety concerns; initiating, recommending, or providing corrective action; verifying implementation of corrective actions; and ensuring compliance with regulations for the use of radioactive material. The Radiation Safety Officer is hereby delegated the authority necessary to meet these responsibilities.

The Radiation Safety Officer has the authority to immediately stop any operations involving the use of byproduct material in which health and safety may be compromised or may result in non-compliance with NRC requirements.



Mirzi Pennington, Site Director



Date

FedEx Express

ORIGIN ID: ZSVA (800) 626-3689
SHIPPING DEPT
MALLINCKRODT MEDICAL INC.
2703 WAGNER PLACE

Ship Date: 22JUN09
ActWgt: 0.1 LB
System#: 0052080/CAFE2361
Account: S 063001317

MARYLAND HEIGHTS, MO 63043
UNITED STATES US

TO ATTN: MR. KEVIN NULL
US NRC REGION III
2443 WARRENVILLE RD. STE 210

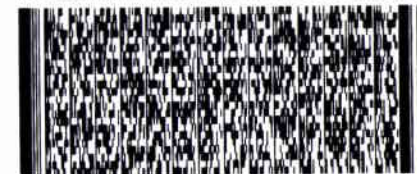
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FZ 531 4536
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TUE
Deliver By:
23JUN09

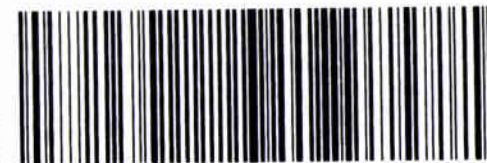
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Part # 169146-034 NRTT 09-06



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